

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JESSICA LITZINGER,

*

Plaintiff

*

v.

*

Civil Action No.: JFM-02-CV-4115

BRADLEY A. MCGUIRK,

*

Defendant

*

* * * * *

ANSWER TO COMPLAINT

Bradley A. McGuirk, Defendant, (hereinafter Defendant) by his attorneys, J. Joseph Curran, Jr., Attorney General and Donald E. Hoffman, Assistant Attorney General, pursuant to Federal R. Civ. P. 8, hereby files his Answer to Plaintiff s Complaint and respectfully says:

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 1 and 2 of the Complaint.

2. Defendant admits the allegations contained in paragraphs 3 and 4 of the complaint.

3. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 5, 6, and 7 of the Complaint.

4. Defendant admits the allegations contained in paragraph 8 of the Complaint.

5. Defendant admits the allegations contained in paragraph 9 of the Complaint.

6. Defendant denies the allegations contained in paragraphs 10, 11, 12, and 13 of the Complaint.

7. Defendant admits the allegations contained in paragraph 14 and 15 of the Complaint.

8. Defendant denies the allegations contained in paragraphs 16, 17, 18 and 19 of the Complaint.

9. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the Complaint.

AFFIRMATIVE DEFENSES

- A. Statutory immunity.
- B. Governmental immunity.
- C. Qualified immunity.
- D. Statute of limitations.

Respectfully submitted,

J. Joseph Curran, Jr.,
Attorney General

Donald E. Hoffman
Assistant Attorney General
Maryland State Police
1201 Reisterstown Road
Pikesville, Maryland 21208
410-653-4223

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of September, 2003, I caused to be served, by and through E-filing with the United States District Court Defendant's Answer to Complaint to Duane A. Verderaime, Esquire, Verderaime & Dubois, P.A., Attorneys for Plaintiff.

Donald E. Hoffman
Assistant Attorney General
Maryland State Police